

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

RICHARD AGUILAR, et al.,

Plaintiffs,

v.

PNC BANK, N.A.,

Defendant.

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Case No. 14-CV-985-LRR

**CONSENT MOTION FOR PROTECTIVE ORDER**

COMES NOW Defendant PNC Bank, N.A. and respectfully requests that the Court enter the Protective Order attached hereto for the purpose of protecting the privacy and confidentiality of certain information produced in response to Plaintiffs' discovery requests. In support of the instant motion, PNC states as follows:

1. PNC is a federally regulated banking institution. Plaintiffs' discovery requests seek information and documents from PNC and its predecessor financial institutions that contain confidential financial and information regarding numerous persons and entities. Thus, PNC may need to disclose otherwise private and confidential information for the purpose of litigating Plaintiffs' claims in this lawsuit.

2. PNC has discussed this issue with counsel for Plaintiffs, who have agreed that entry of the attached Protective Order is proper to protect the privacy and confidentiality of this information.

3. The Court should therefore enter the attached proposed Protective Order, which addresses the handling of Confidential Information (as defined in the proposed Protective Order), requires the documents produced and discovery otherwise obtained in this case to be used only in

connection with the litigation of this case, and mandates that each party return such documents produced and discovery obtained to the producing party upon the completion of this case, including any appeals.

WHEREFORE, for the foregoing reasons, Defendant PNC Bank, N.A. respectfully requests that the Court enter the Protective Order attached hereto, with Plaintiffs' consent, and grant any further relief the Court deems just and proper.

Dated: May 26, 2015

Respectfully submitted,

BRYAN CAVE LLP

/s/ Herbert R. Giorgio, Jr.

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Attorneys for Defendant

PNC Bank, N.A.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed electronically this 26th day of May, 2015 and served on all counsel of record via operation of the Court's electronic filing system

/s/ Herbert R. Giorgio, Jr.